

**Gates, Nina**

2009-144-C

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**From:** Jenifer Simpson [JSimpson@aapd.com]  
**Sent:** Tuesday, November 03, 2009 5:23 PM  
**To:** Commissioner.Whitfield; Commissioner.Wright; Chairman.Hamilton; ViceChairman.Howard; Commissioner.Mitchell  
**Subject:** AAPD letter in re Docket 2009-144-C  
**Attachments:** AAPD Letter to SC PUC re wireless lifeline Tracfone sec.doc

Dear Commissioners,

A copy of AAPD's letter to Chairman Fleming is attached. We faxed this to Ms. Fleming today as well as to two regulatory staff (.Hammonds, Edwards)

Thank you for your consideration of our point of view in this matter. We hope you will move soon on the matter.

Sincerely,

*Jenifer Simpson*  
*Senior Director, Government Affairs*  
*American Association of People with Disabilities (AAPD)*  
*1629 K Street, NW, Suite 950, Washington, DC USA 20006*  
*Tel: 202-521-4310; Email [JSimpson@aapd.com](mailto:JSimpson@aapd.com)*  
*More at <http://www.aapd.com>*

END



November 3, 2009

Elizabeth B. Fleming, Chairperson  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**VIA FAX TO (803) 896-5199**

**DOCKET: 2009-144-C**

Dear Chairman Fleming:

The American Association of People with Disabilities (AAPD) is the nation's largest independent disability membership organization<sup>1</sup> and, on behalf of thousands of people with disabilities and their families in South Carolina, we write to you about Lifeline services in South Carolina. We write about this critical program for low-income people because there are significantly high numbers of people with disabilities and who are low income in South Carolina and who could benefit from more consumer options.

We believe most of these individuals with disabilities, and their households, do not participate currently in the Lifeline phone program and would participate more, if there were more options and more widely available information. AAPD urges you to allow TracFone Wireless to provide their wireless Lifeline service, Safelink, as soon as possible, for the following reasons:

***About low income people with disabilities in South Carolina***

In South Carolina the overall percentage (prevalence rate) of people with a disability was 16.7 percent in 2007. That is, of the 4.1 million people living in South Carolina, 677,000 people have a disability. The employment rate of working-age people with disabilities was 30 percent, compared to a 79.3 percent employment rate for working-age people *without* disabilities. The average household income of people with disabilities in South Carolina is accordingly lower than households without disability. The median income of households that include any working-age

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<sup>1</sup> AAPD is a national nonprofit cross-disability member organization, dedicated to ensuring economic self-sufficiency and political empowerment for more than 50 million Americans with disabilities. AAPD works in coalition with other disability organizations for the full implementation and enforcement of disability nondiscrimination laws, particularly the Americans with Disabilities Act (ADA) of 1990 and the Rehabilitation Act of 1973, as well as the disability accessibility mandates in the Communications Act. AAPD is the only national cross-disability organization with a Telecommunications & Technology Policy Initiative (TTPI) across all disabilities and is a founding and steering committee member of the 250+-member Coalition of Organizations for Accessible Technology (COAT), at <http://www.coataccess.org>.

people with disabilities in South Carolina was \$33,600 (in 2007). This is far lower than the median income of households that do not include any working-age people with disabilities, which was \$50,800.<sup>2</sup>

Based on these statistics, derived from the U.S. Census American Community Survey (ACS) in 2007, we believe that people with disabilities in South Carolina earn less and live in poorer households. They would benefit greatly from more options in communications services, such as free wireless services, including services supported through the Lifeline program.

### ***Lifeline participation is low in South Carolina***

In South Carolina, the Federal Communications Commission estimates that the current Lifeline participation rate is less than 10 percent for low income people overall.<sup>3</sup> It is clear that there is a great need for Lifeline services by people with disabilities in South Carolina, as well as a need to increase access to the program. We know that telephone services enhances the quality of life for all consumers, and can be an essential lifeline for people with disabilities.

### ***Wireless communication is innovative and growing***

The use of wireless communication is an extraordinary innovation in the design and implementation of Lifeline services. Innovation should be encouraged, not delayed, especially in these challenging economic times. A free wireless telephone would make an enormous difference in the lives of very large numbers of low-income South Carolina residents with disabilities.

There is little doubt that wireless technology and services have grown exponentially in the last 25 years. Like everywhere else, in key areas such as education, public safety, and in healthcare, wireless service provides South Carolinians with twenty-first century tools to communicate and connect, to alert others when they are in danger and to contact public safety offices as needed. Our concern is that lower income people, such as those with disabilities, are being left out or left behind as this technology expands.

Our understanding is that TracFone's Safelink program has helped increase Lifeline participation rates in Georgia, Florida, North Carolina and Virginia and nationwide, with now more than 2 million Americans participating in the program. AAPD would like South Carolina residents – particularly those with disabilities – to enjoy this benefit. AAPD urges you to reconsider and to allow Safelink services to be offered as soon as possible.

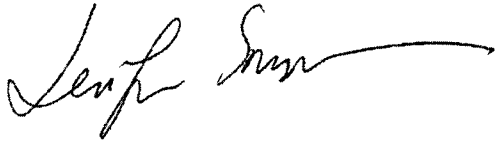
AAPD appreciates this opportunity to provide some input to the Public Service Commission on the important topic of Lifeline services for consumers with disabilities in South Carolina.

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<sup>2</sup> Erickson, W., & Lee, C. (2008). *2007 Disability Status Report: South Carolina*. Ithaca, NY: Cornell University Rehabilitation Research and Training Center on Disability Demographics and Statistics. At [http://www.ilr.cornell.edu/edi/disabilitystatistics/StatusReports/2007-HTML/2007-StatusReport\\_SC.html](http://www.ilr.cornell.edu/edi/disabilitystatistics/StatusReports/2007-HTML/2007-StatusReport_SC.html), last accessed 11/3/09.

<sup>3</sup> Current Population Survey of Households (CPSH) March 2002 data, at [http://www.universalservice.org/\\_res/documents/about/pdf/fcc-orders/2005-fcc-orders/Baseline-Lifeline-Study-8-9-05.pdf](http://www.universalservice.org/_res/documents/about/pdf/fcc-orders/2005-fcc-orders/Baseline-Lifeline-Study-8-9-05.pdf), accessed 11-2-09.

Sincerely,

A handwritten signature in black ink, appearing to read "Jenifer Simpson", with a long horizontal flourish extending to the right.

Jenifer Simpson, Senior Director, Government Affairs & Technology Policy Initiatives  
Tel 202-521-4310; Email [jsimpson@aapd.com](mailto:jsimpson@aapd.com)

CCs:

Commissioners Swain E. Whitfield, David A. Wright, G. O'Neal Hamilton, John E. "Butch" Howard, Randy Mitchell, VIA E-mail

Lessie Hammonds, Nanette S. Edwards, Office of Regulatory Affairs, VIA Fax (803) 737-0895

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